

1 MICHAEL A. JACOBS (CA SBN 111664)  
2 MJacobs@mofo.com  
3 ARTURO J. GONZÁLEZ (CA SBN 121490)  
AGonzález@mofo.com  
3 MORRISON & FOERSTER LLP  
4 425 Market Street  
San Francisco, California 94105-2482  
5 Tel: 415.268.7000 / Fax: 415.268.7522

6 KAREN L. DUNN (*Pro Hac Vice*)  
kdunn@bsfllp.com  
7 HAMISH P.M. HUME (*Pro Hac Vice*)  
hhume@bsfllp.com  
8 BOIES SCHILLER FLEXNER LLP  
1401 New York Avenue, N.W.  
Washington DC 20005  
9 Tel: 202.237.2727 / Fax: 202.237.6131

10 WILLIAM CARMODY (*Pro Hac Vice*)  
bcarmody@susmangodfrey.com  
11 SHAWN RABIN (*Pro Hac Vice*)  
srabin@susmangodfrey.com  
12 SUSMAN GODFREY  
1301 Avenue of the Americas, 32nd Floor  
13 New York, NY 10019-6023  
14 Tel: 212.336.8330 / Fax: 212.336.8340

15 Attorneys for Defendants  
16 UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA  
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,

Case No. 3:17-cv-00939-WHA

21 Plaintiff,

**DECLARATION OF THOMAS J.  
PARDINI IN SUPPORT OF  
PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL ITS RESPONSE  
TO DEFENDANTS' BRIEF RE  
UNJUST ENRICHMENT PER THE  
COURT'S ORDER (DKT. 2411)**

22 v.

23 UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,

24 Defendants.

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1 I, Thomas J. Pardini, declare as follows:

2 1. I am a member of the Bar of the State of California and an attorney at the law firm  
 3 of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal  
 4 knowledge and if called as a witness, I could and would competently testify to the matters set  
 5 forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion  
 6 to File Under Seal Its Response to Defendants' Brief Re Unjust Enrichment Per the Court's Order  
 7 (Dkt. 2411).

8 2. I have reviewed the following documents and confirmed that only the portions  
 9 identified below merit sealing:

10 Document	11 Portions to Be Filed Under Seal
12 Waymo's Response	Blue Highlights

13 3. The blue highlights of Waymo's Response contain highly confidential information  
 14 regarding Uber's past monthly estimated costs for its self-driving car program, as well as its  
 15 development timeline goals. I understand that disclosure of this information could allow  
 16 competitors to acquire insight into Uber's detailed past financial information and development  
 17 timeline strategy, allowing competitors to tailor their own business strategy to the detriment of  
 18 Uber.

19 4. Defendants' request to seal is narrowly tailored to the portions of Waymo's  
 20 Response that merits sealing.

21 I declare under penalty of perjury that the foregoing is true and correct. Executed this  
 22 26th day of December, 2017 at San Francisco, California.

23 \_\_\_\_\_/s/ Thomas J. Pardini

24 Thomas J. Pardini